

EXHIBIT P

Excerpts from the Deposition of K. Clements

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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CROWN BEVERAGES, INC.,)
a Nevada corporation,)
)
Plaintiff,)
)
vs.)
)
SIERRA NEVADA BREWING CO.,)
a California corporation,)
)
Defendant.)
_____)

Case 3:16-cv-00695-MMD-VPC

VIDEO DEPOSITION OF KIMBERLY CLEMENTS
04/07/2017
Reno, Nevada

REPORTED BY: JOHN MOLEZZO
NV CCR #267, CA CSR #7791
JOB NO.: 382837

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1 BY MR. REID:

2 Q I'm going to -- I'll get into other reports if I
3 need to pull teeth, you know. I want to know if you have
4 any reason to dispute the fact that Crown's sales -- We
5 can limit it to last year, we can talk about prior years,
6 because the answer is the same -- that Crown's sales are
7 better than the trends in its region and the trends of
8 the brewery as a whole. Do you disagree with that?

9 MR. WELSH: Objection, argumentive, misstates
10 the data.

11 THE WITNESS: I -- I don't disagree with that.

12 BY MR. REID:

13 Q So what is it about -- is there anything about
14 Crown's sales performance that, in your belief, Sierra
15 Nevada had a basis to terminate the relationship?

16 MR. WELSH: Objection, vague, ambiguous.

17 THE WITNESS: As far as their sales performance?

18 BY MR. REID:

19 Q Yeah.

20 A I believe that, based on all of the information
21 that I've seen, that their sales performance could've
22 been so much more robust had they performed to the
23 standards with which the rest of the market performs.

24 Q Okay. So is the same true then about all the
25 other Sierra Nevada distributors that perform worse than

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1 STATE OF NEVADA)

2) ss.

3 COUNTY OF WASHOE)

4 I, JOHN MOLEZZO, a Certified Court Reporter in
5 and for the County of Washoe, State of Nevada, do hereby
6 certify: That on Friday, the 7th day of April, 2017, at
7 the hour of 9:04 p.m. of said day, at the offices of
8 LEWIS, ROCA, ROTHGERBER, CHRISTIE, LLP, Attorneys at Law,
9 50 West Liberty Street, #410, Reno, Nevada, personally
10 appeared KIMBERLY CLEMENTS, who was duly sworn by me to
11 testify the truth, the whole truth, and nothing but the
12 truth, and thereupon was deposed in the matter entitled
13 herein;


14 That said deposition was taken in verbatim
15 stenotype notes by me, a Certified Court Reporter, and
16 thereafter transcribed into typewriting as herein
17 appears;

18 That the foregoing transcript, consisting of
19 Pages 1 through 277, is a full, true and correct
20 transcript of my stenotype notes of said deposition to
21 the best of my knowledge, skill and ability.

22 DATED: At Reno, Nevada, this 9th day of April,
23 2017.

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JOHN MOLEZZO
NV CCR #267, CA CSR #7791